

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JOSE PANORA,
*on his own behalf and on behalf of
others similarly situated,*

Case No. 19–CV–7267 (BMC)

Plaintiff,

-against-

DEENORA CORP.
d/b/a Dee's;
DEE's BRICK OVEN PIZZA, INC
d/b/a Dee's; and
DEERAN ARABIAN a/k/a Dee Arabian

**DECLARATION OF AARON N.
SOLOMON IN OPPOSITION TO
PLAINTIFF'S MOTION FOR
CONDITIONAL COLLECTIVE
CERTIFICATION**

Defendants.
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AARON N. SOLOMON, ESQ., declares under penalty of perjury:

1. I am a member of the bar of this Court and a partner at the law firm of Kaufman Dolowich & Voluck, LLP ("KDV"), attorneys for Defendants, Deenora Corp. d/b/a Dee's, Dee's Brick Oven Pizza, Inc. d/b/a Dee's and Deeran Arabian a/k/a Dee Arabian (collectively, "Defendants") in the above-captioned action.

2. This Declaration is based on my personal knowledge.

3. I submit this Declaration in opposition to Plaintiff's motion for conditional collective certification.

4. Annexed hereto as **Exhibit A** is a true and correct copy of the transcript for the February 12, 2020 hearing in this matter.

5. Annexed hereto as **Exhibit B** is a true and correct copy of the transcript for the August 20, 2020 hearing in this matter.

6. Annexed hereto as **Exhibit C** is a true and correct copy of the transcript for the August 1, 2019 hearing before the Hon. Paul A. Engelmayer, U.S.D.J. in *Yeh v. Han Dynasty, Inc.*, et al., 18 CV 6018 (PAE).

7. Annexed hereto as **Exhibit D** is the September 10, 2020 Declaration of Deeran Arabian submitted in opposition to Plaintiff's motion for conditional collective certification.

WHEREFORE, Defendants request Plaintiff's motion for conditional collective certification be denied, and, further, that the Court award all further relief that it deems to be just and proper.

I declare, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the foregoing is true and correct.

Executed on September 10, 2020.

A handwritten signature in black ink, appearing to be 'A. N. Solomon', written over a horizontal line.

AARON. N. SOLOMON